

Message

From: marion freistadt **Ex. 6 Personal Privacy (PP)**
Sent: 5/13/2022 1:47:37 PM
To: DEQ.PUBLICNOTICES@LA.GOV
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Subject: LDEQ, AI# 168755, Public Comments for "Louisiana's Annual Monitoring Network Plan" (2022)

Louisiana Department of Environmental Quality
Office of Environmental Services
Public Participation and Permit Support Division
Public Participation Group
P.O. Box 4313
Baton Rouge, LA 70821

DEQ.PUBLICNOTICES@LA.GOV

Re: LDEQ, AI# 168755, Public Comments for "Louisiana's Annual Monitoring Network Plan" (2022)

To Louisiana Department of Environmental Quality:

Thank you for the opportunity to comment. This letter is a public comment in response to the "Annual Monitoring Network Plan" of April 14, 2022.

<https://edms.deq.louisiana.gov/app/doc/view?doc=13228415&ob=yes&child=yes>

This public comment request asked specifically for the general public to: (1) "determine if the network requires any modifications to continue to meet its monitoring objective and data needs (through termination of existing stations, relocation of stations, or establishment of new stations)"; and (2) to "investigate ways to improve the network to ensure that it provides adequate, representative, and useful air quality data."

To point (1): The network requires modifications. To point (2) Ways to improve the network are presented below.

Point (1):

<!--[if !supportLists]-->1. <![endif]-->There are not enough monitors. There are 992 high-emissions TRI-reporting facilities in Louisiana (EPA 2022. TRI Toxics Tracker). There are only 35 air monitors with unique address locations. Moreover, 10 of the 35 are designated “General Background” monitors, leaving 25 for toxics. It should be obvious that 25 air monitors are not sufficient for 992 facilities.

<!--[if !supportLists]-->2. <![endif]-->Most monitors are not located at source sites. Only five of the 25 are described as located at high-emission TRI-reporting facilities (sources). These are located:

<!--[if !supportLists]-->a. <![endif]-->#2 a landfill, (Baker, LA, near the Exide recycle site)

<!--[if !supportLists]-->b. <![endif]-->#18: a recycling site (LaPlace)

<!--[if !supportLists]-->c. <![endif]-->#27: a refinery (in Norco, near Shell Refinery)

<!--[if !supportLists]-->d. <![endif]-->#7: a petrochemical company (Chalmette, near Rain II Carbon)

e. <![endif]-->#20: an empty field (Madisonville, which is near no obvious source).

3. The monitors are not measuring the pertinent pollutants. For example, monitor #12 in Garyville, LA is placed right in the middle of, and less than one mile from each of four different TRI-reporting facilities, Atlantic Alumina (Noranda), a metal fabrication industry, Nalco, a chemical industry, and Rain CII and Marathon Garyville, refineries. The latter factory is the fourth largest refinery in the United States (U.S.). Hazardous air pollutants emitted from refineries include benzene, toluene, ethylbenzene, xylene, and other volatile organic compounds (VOCs). Yet this particular air monitor only measures ozone, a secondary pollutant, which forms when heat and sunlight cause chemical reactions between nitrogen oxides (NOx) and VOCs.

<!--[if !supportLists]-->4. <![endif]-->Several “General Background” monitors should be re-classified as source-oriented. For example:

<!--[if !supportLists]-->a. <![endif]-->Monitor #12, in Garyville, LA should not be considered a “General Background” air monitor. It should also include measures of VOCs, NOx, SO2, O3, Pb, CO, PM10 and PM2.5.

<!--[if !supportLists]-->b. <![endif]-->Similarly, the Meraux air monitor (#22), which is also classified as “General Background” is located < 1 mile from the Valero Meraux Energy Corporation. It measures ozone, SO2 and H2S. Monitor #22 should also not be classified as a General Background monitor, and it should include in its detection NOx, PM2.5., PM10 and CO as well.

<!--[if !supportLists]-->c. <![endif]-->The Dutchtown monitor (#10), which is also classified as “General Background” is less than two miles from the nearest TRI-reporting high emissions facility, and less than four miles to eight distinct TRI-reporting facilities, including Occidental, Shell Petroleum, BASF, Westlake, Linde and Hexion.

<!--[if !supportLists]-->5. <![endif]-->At least one classified as “high” is not near a major emissions source.

<!--[if !supportLists]-->a. <![endif]-->Shreveport’s “High” monitor, Dixie, is in a rural area near no known major air emissions source.

<!--[if !supportLists]-->b. <![endif]-->A monitor by Bayou Sauvage National Wildlife Area is reported to monitor for arsenic and PM2.5. However, it is far away from any major source.

<!--[if !supportLists]-->6. <![endif]-->For each background monitor there should at least be one source-specific monitor in the region appropriately located away from sources that is measuring the same pollutants for comparison.

<!--[if !supportLists]-->7. <![endif]-->Some monitors are classified as “High Population Density” but are not in such areas. One is in Hammond, one is in Houma/Thibodaux, one in Lafayette, two are in Shreveport, one is in Kenner, and one is in Lake Charles.

<!--[if !supportLists]-->8. <![endif]-->Several heavily industrialized areas of the state with relatively large estimates of cancer risk from stationary sources = do not appear to have any “Source-Oriented” air monitors.

<!--[if !supportLists]-->a. <![endif]-->For example, Lake Charles is a heavily industrialized area where the primary cancer risk driver is, according to EPA’s AirToxRisk model, ethylene oxide from industry. Yet it only has two air monitors, Westlake and Carlyss. Carlyss is classified as a “General Background” air monitor which measures ozone, and Westlake is a “High Population Area” air monitor which measures SO2, NOx, and PM2.5. Neither of these air monitors is considered a “Source Oriented” air monitor, despite being near a major industrial area.

<!--[if !supportLists]-->b. <![endif]-->Alexandria has one air monitor for the “General Background.” There is no source-oriented air monitor in this area, which is a surprise considering this area encompasses Colfax, the only commercial facility in the nation allowed to burn explosives and munitions waste.

<!--[if !supportLists]-->c. <![endif]-->It is unknown if monitoring is being conducted at all at these RSEI high-risk facilities: (1) BASF Corp, Geismar, LA, (2) St. Union Carbide, Hahnville, LA, (3) BCP Ingredients, St Gabriel, LA, (4) DOW Chemical, Plaquemine, LA, (5) Shell Chemical, Geismar, LA, (6) Evonik Corp, Reserve, LA, (7) Sasol Chemicals, Lake Charles, LA, (8) Exxon Mobil, Baton Rouge, LA, (9) Denka/Dupont, LaPlace LA (VOCs are currently being monitored), (10) LACC LLC, Lamotte Chemical, LA, (11) Shell Norco Chemical Plant, Norco, LA; (12) Formosa Plastics, (13) Occidental Chemical Holding Corp, (14) Eagle US LLC.

<!--[if !supportLists]-->9. <![endif]-->Addressing of Environmental Justice considerations (P.6 of report) is not sufficient. The report describes one meeting in 2016 and states that data in 3 neighborhoods in St. Rose, Marrero and Irish Channel are collected. EJ concerns are throughout “Cancer Alley” (11 parishes) especially in St. James and St. John the Baptist Parishes.

Point (2): Improvements:

<!--[if !supportLists]-->1. <![endif]-->Site choice for air monitors should be carried out by an independent oversight committee. Out-of-state experts should be included.

<!--[if !supportLists]-->2. <![endif]-->Increase the number of air monitors. Ideally it should be the same as (or more than) the number of high TRI-emitting facilities.

<!--[if !supportLists]-->3. <![endif]-->If budgetary concerns limit the number of monitors, priority should be placed on:

<!--[if !supportLists]-->a. <![endif]-->The levels of emissions

<!--[if !supportLists]-->b. <![endif]-->Relative toxicity of emissions

<!--[if !supportLists]-->c. <![endif]-->Proximity of fenceline communities (Environmental Justice concerns)

<!--[if !supportLists]-->d. <![endif]-->Existing cancer risk

<!--[if !supportLists]-->4. <![endif]-->SB20 was deferred by the Senate Environmental Quality Committee in April 2022. The bill proposed a way to pay for new monitors, which was estimated \$17,000 per facility (a very small amount). Please put this system in place.

<!--[if !supportLists]-->5. <![endif]-->Relevant, emitted toxins should be chosen for monitoring.

<!--[if !supportLists]-->6. <![endif]-->Control ("Background") monitors should measure the same pollutants as Source-Oriented Monitors.

<!--[if !supportLists]-->7. <![endif]-->A recent Louisiana Legislative Audit ([https://www.lla.la.gov/publicreports.nsf/0/4f3372abddf0f271862586630067c25d/\\$file/00022660a.pdf](https://www.lla.la.gov/publicreports.nsf/0/4f3372abddf0f271862586630067c25d/$file/00022660a.pdf)) reported that "Louisiana has the highest toxic air emissions per square mile of any state, according to the EPA's Toxics Release Inventory, and the EPA's most recent (2014) National Air Toxics Assessment showed parts of Louisiana have high potential cancer risks and/or a high respiratory hazard index." At the same time the auditor reported that "DEQ's positions dedicated to air quality regulation decreased an estimated 15%, from 247 to 211 between 2010 and 2019." My recommendation is to improve the performance of LDEQ. The state currently has a budget surplus and the federal government has legislated infrastructure funding. This should be used to improve the LDEQ. This would apply to the current comments as well as other deficiencies in LDEQ.

<!--[if !supportLists]-->8. <![endif]-->Significantly improve the LDEQ web site. Make the documents easily accessible and searchable (they are currently not searchable on-line).

<!--[if !supportLists]-->9. <![endif]-->Community meetings for Environmental Justice should be initiated immediately. Community involvement should include fenceline organizations such as Rise St. James, Inclusive Louisiana, Concerned Citizens of St. John, The Descendants Project and Coalition against Death Alley.

Thank you for your consideration

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